

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**BRENDA LYNN GEIGER; CLAUDIA  
SAMPEDRO; JESSICA BURCIAGA;  
IESHA MARIE CRESPO; JESSICA  
ROCKWELL; and LUCY PINDER,**

**PLAINTIFFS**

**v.**

**RP ENTERTAINMENT, LLC d/b/a CLUB  
TABU a/k/a TABU NIGHTCLUB a/k/a  
TABU; and KILLEEN 2007 LLC d/b/a  
MANGOS;**

**DEFENDANT**

**Case No. 6:21-cv-00145**

**ALL PARTIES' STIPULATION AND  
NOTICE OF SETTLEMENT AND  
MOTION TO VACATE ALL  
DEADLINES**

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All Parties respectfully notify the Court that they met multiple times to discuss settlement in the above-referenced matter. On Friday, March 4, 2022, the parties agreed, in principle, to settle the above-captioned matter. Counsel for the parties need to finalize settlement terms and are in the process of preparing and finalizing the Settlement Agreement and Stipulated Dismissal. The parties intend to file the Stipulated Dismissal as soon as practicable, but respectfully request that the parties are given 45 days to file the Stipulated Dismissal to give the parties time to finalize terms without having to continue meeting scheduled pre-trial deadlines, which will impose potentially unnecessary time and expense burdens on the parties, as well as the Court and its staff.

Accordingly, all pending motions and responses, if any, are withdrawn, and all Parties respectfully request that the Court vacate all deadlines as set forth in the Scheduling Order entered

by this Court, and request that the Court stay these proceedings for 45 days and set the case for a status conference no earlier than 45 days from now in the unlikely event the settlement is not finalized and the stipulation of dismissal has not been filed before then. Plaintiffs are filing this Notice and Motion with Defendants' approval and permission after a conference on the same.

Dated March 7, 2022

**THE CASAS LAW FIRM, P.C.**

*/s/Dennis C. Postiglione*

By: \_\_\_\_\_  
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*/s/ Marcus Mataga*

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**Attorneys for Defendants**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on this 4th day of March 2022 I spoke to counsel for Defendants, Marcus Mataga, and he and agreed that the above stipulation would be filed under electronic signatures as agreed to by all Parties.

*/s/Dennis C. Postiglione*

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Dennis C. Postiglione

**CERTIFICATE OF SERVICE**

I certify that this Motion was served upon counsel below via the Email in addition to email, pursuant to the Federal Rules of Civil Procedure on March 7, 2022.

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**Attorneys for Defendants**

*/s/Dennis C. Postiglione*

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